

MAZIE SLATER KATZ & FREEMAN, LLC

103 Eisenhower Parkway, Suite 207, Roseland, NJ 07068

Phone: (973) 228-9898 - Fax: (973) 228-0303

www.mazieslater.com

David A. Mazie*
Adam M. Slater*^o
Eric D. Katz*^o
David M. Freeman
Beth G. Baldinger
Matthew R. Mendelsohn^o
David M. Estes

*Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney

Karen G. Kelsen^o
Cheryll A. Calderon
Adam M. Epstein^o
Cory J. Rothbort*^o
Michael R. Griffith^o
Christopher J. Geddis
Samuel G. Wildman
Julia S. Slater^o

^oMember of N.J. & N.Y. Bars

July 23, 2021

VIA ECF AND EMAIL

TIV@stevenslee.com

Hon. Thomas I. Vanaskie (Ret.)

Special Master

Stevens & Lee

1500 Market St., East Tower, Suite 1800

Philadelphia, Pennsylvania 19103-7360

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***
Case No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Vanaskie:

Please accept this letter on behalf of the Plaintiffs as a request to submit a reply to ZHP's brief regarding its waiver of certain confidentiality designations. Plaintiffs' request is directed to the request in that brief to strike Plaintiffs' initial brief on this issue.

After Plaintiffs' filing of their brief, ZHP reached out to Plaintiffs' counsel to point out the late filing of the brief by two days, and requested that Plaintiffs accordingly agree to a commensurate two day extension for ZHP to file its responsive brief, to which Plaintiffs consented. This was then confirmed with the Court. (*See* Ex. A). Thus, Plaintiffs were surprised to see the argument to strike Plaintiffs' brief, and accordingly request denial of this request, which is

Hon. Thomas I. Vanaskie, Special Master

July 23, 2021

Page 2

inconsistent with ZHP's consent to the filing conditioned on the two-day extension accorded to ZHP.

Plaintiffs' arguments and recitation of the immutable facts and dates that establish waiver, and demonstration that the Court should reject ZHP's tortured interpretation of the procedure set forth in the Confidentiality and Protective Order, should be considered in full.

Thank you for your consideration.

Respectfully,



Adam M. Slater